

ORIGINAL

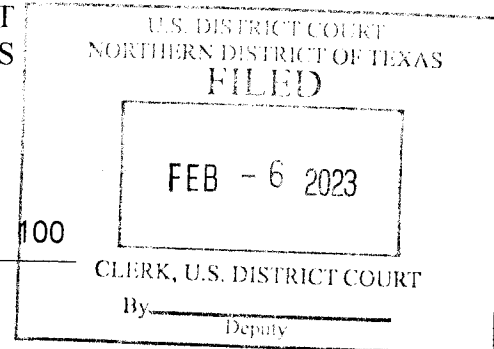
IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

VICTOR CERVANTES (01)

No. 4:23-MJ-100



CRIMINAL COMPLAINT

**Alleged Offense:**

I, Katie Durham, a Special Agent with the Drug Enforcement Administration ("DEA"), being first duly sworn, hereby depose and state as follows:

On or about August 31, 2022, in the Fort Worth Division of the Northern District of Texas (NDTX), defendant **Victor Cervantes** did knowingly and intentionally possess with intent to distribute 40 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B).

1. I am a Special Agent with the Drug Enforcement Administration (DEA), assigned to the Dallas Field Division, HIDTA III. The statements set forth in this affidavit are true and correct to the best of my knowledge and belief but are not inclusive of all the evidence or information in the case.

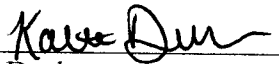
2. In May 2022, DEA Dallas HIDTA Group 3 Agents received information about a Drug Trafficking Organization (DTO) that was distributing large amounts of Cocaine, counterfeit Oxycodone M30 fentanyl tablets and other narcotics in Fort Worth, Texas.

3. Between May 2022 and January 2023, Agents have utilized a DEA Confidential Source (CS), and electronic and physical surveillance to monitor the actions of members of this DTO. Through the investigation, Agents learned that Victor Cervantes, aka "Vic", was one of the leaders of this DTO.

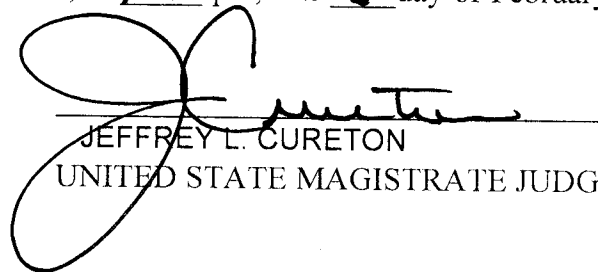
4. Between September and October 2022, Agents utilized a DEA Undercover (UC) to set up a deal for 500 (five hundred) M30 fentanyl pills in exchange for a predetermined amount of US Currency. The UC was informed by another member of the DTO to meet up at 4213 Cole Street, Fort Worth, Texas, to conduct the purchase. This address was previously identified by a Confidential Source (CS) to be a narcotics distribution location for the DTO. August 31, 2022, Agents set up surveillance around 4213 Cole Street. The UC then traveled to 4213 Cole Street. Agents observed Cervantes arrive at and enter the residence of 4213 Cole Street and then walk outside to meet the UC at which point the UC was given the pills by Cervantes. The pills were later field tested by Agents and tested positive for the presence of fentanyl, there were approximately 500 (five hundred) fentanyl pills seized. After the deal, the UC confirmed that the driver's license photograph of Cervantes matched the individual the UC bought the pills from.

5. Through this investigation, Agents identified two different phone numbers for Cervantes, 817-706-0360 (TT1) and 682-699-1000 (TT2). Through the use of telephonic geolocational surveillance Agents identified that Cervantes was the user of both TT1 and TT2. CS information revealed that Cervantes used both of these phone numbers to discuss drug transactions.

6. Based on the investigation to date, I believe that **Victor Cervantes** knowingly and intentionally possessed over 40 grams of fentanyl with the intent to distribute.

  
Katie Durham  
Special Agent  
Drug Enforcement Administration

SWORN AND SUBSCRIBED before me, at 1:40 pm, this 6<sup>th</sup> day of February 2023, in Fort Worth, Texas.

  
JEFFREY L. CURETON  
UNITED STATE MAGISTRATE JUDGE